

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARCI A. FREDERICK, individually, and)
on behalf of all others similarly situated,)
)
Plaintiffs,)
)
v.)
)
UNITED STATES OLYMPIC COMMITTEE,) Civil Action No: 1:18-cv-11299
USA GYMNASTICS (formerly known as the)
United States Gymnastics Federation),)
RICHARD CARLSON, MURIEL)
GROSSFELD, GEORGE WARD,)
)
Defendants.)

DEFENDANT GEORGE WARD'S MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), defendant George Ward, by and through the undersigned counsel, hereby moves to dismiss the Amended Complaint in its entirety as against Mr. Ward.

In support of this motion, Mr. Ward relies on the Memorandum of Law and supporting Affidavit filed contemporaneously herewith.

Date: October 19, 2018

Respectfully submitted,

GEORGE WARD,

By his attorneys,

/s/ Joseph P. Davis

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REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Mr. Ward believes that oral argument will assist the Court in deciding this Motion to Dismiss and respectfully requests oral argument.

/s/ Kelly M. Bradshaw
Kelly M. Bradshaw

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

In accordance with Local Rule 7.1(a)(2), I hereby certify that I attempted in good faith to confer with Plaintiff's counsel via telephone and email regarding Mr. Ward's Motion to Dismiss, and have been unable to resolve or narrow the issues raised in the motion.

/s/ Kelly M. Bradshaw
Kelly M. Bradshaw

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2018, I electronically filed the above motion and related documents by using the CM/ECF system which will send notification of such filing(s) to all registered participants in this matter.

/s/ Kelly M. Bradshaw
Kelly M. Bradshaw